1	Lexi J. Hazam (SBN 224457)	
2	lhazam@lchb.com LIEFF CABRASER HEIMAN	
	& BERNSTEIN, LLP	
3	275 Battery Street, 29th Floor San Francisco, CA 94111-3339	
4	Telephone: (415) 956-1000 Facsimile: (415) 956-100	
5	, ,	
6	Christopher A. Seeger (pro hac vice) cseeger@seegerweiss.com	
7	SEEGER WEISS, LLP 55 Challenger Road 6th Floor	
8	Ridgefield Park, NJ 07660 Telephone: (973) 639-9100	
	Facsimile: (973) 679-8656	
9	Previn Warren (pro hac vice)	
10	pwarren@motleyrice.com MOTLEY RICE, LLC	
11	401 9th Street NW, Suite 630 Washington, DC 20004	
12	Telephone: (202) 386-9610	
13	Facsimile: (202) 232-5513	
14	Plaintiffs' Co-Lead Counsel	
	Trumijjs Co-Leua Counsei	
15		_
16	[Additional Counsel Listed on Signature Page	
17		
18	UNITED STATI	ES DISTRICT COURT
19		TRICT OF CALIFORNIA
20	NORTHERN DIST	RICI OF CALIFORNIA
21		
	IN RE: SOCIAL MEDIA ADOLESCENT ADDICTION/PERSONAL INJURY	Case No. 4:22-MD-03047-YGR
22	PRODUCTS LIABILITY LITIGATION	MDL No. 3047
23		STIDIII ATION AND IDDODOSEDI
24	This Document Relates to:	STIPULATION AND [PROPOSED] ORDER REGARDING VIDEO ACCESS
25	ALL ACTIONS	FOR OCTOBER 27, 2023 HEARING
26		
27		
28		

1	Plaintiffs and Meta Platforms, Inc., Facebook Holdings, LLC, Facebook Operations, LLC,
2	Facebook Payments, Inc., Facebook Technologies, LLC, Instagram LLC, and Siculus Inc. ("Meta
3	Entities"); Snap Inc.; TikTok Inc. and ByteDance Inc. ("TikTok Entities"); and YouTube, LLC,
4	Alphabet Inc., and Google LLC ("Google Entities") (collectively "Defendants") (together the
5	"Parties") by and through their counsel of record hereby stipulate as follows:
6	WHEREAS, a hearing on Defendants' motions to dismiss has been scheduled to take
7	place on October 27, 2023 at 10:30 a.m. in the Northern District of California, Oakland Division,
8	Courtroom 1, Fourth Floor;
9	WHEREAS, the Court has advised that it will allow video access to the hearing for the
10	general public if the parties submit a joint request for the same, and as long as the Ninth Circuit
11	has not rescinded its pandemic-era policy, which would limit remote access to in-court
12	proceedings to audio only, prior to the hearing;
13	WHEREAS, significant resources will be saved if some out-of-town counsel are able to
14	view the October 27, 2023 hearing remotely rather than traveling to appear in person;
15	WHEREAS, the Parties prefer to observe the hearing remotely by video if given the
16	option; and
17	WHEREAS, the Parties have conferred, agree, and jointly seek Court approval, for the
18	following:
19	1. If the Ninth Circuit has not rescinded its pandemic-era policy prior to the October 27,
20	2023 hearing, public video access will be permitted for the hearing using the webinar
21	link found on the Court's webpage; and
22	2. If the Ninth Circuit does rescind its pandemic-era policy prior to the October 27, 2023
23	hearing, there will be audio remote access only for the hearing.
24	Dated: October 19, 2023 /s/ Jennie Lee Anderson
25	JENNIE LEE ANDERSON ANDRUS ANDERSON, LLP
26	155 MONTGOMERY STREET, SUITE 900 SAN FRANCISCO, CA 94104
27	Telephone: + 1 (415) 986-1400 Email: jennie@andrusanderson.com
28	Liaison Counsel for Plaintiffs

1	LEXI J. HAZAM
2	LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
3	275 BATTERY STREET, 29TH FLOOR SAN FRANCISCO, CA 94111-3339
4	Telephone: +1 (415) 956-1000 Email: lhazam@lchb.com
5	CHRISTOPHER A. SEEGER
6	SEEGER WEISS, LLP 55 CHALLENGER ROAD, 6TH FLOOR
7	RIDGEFIELD PARK, NJ 07660 Telephone: + 1 (973) 639-9100
8	Facsimile: + 1 (973) 679-8656 Email: cseeger@seegerweiss.com
9	PREVIN WARREN
10	MOTLEY RICE LLC 401 9th Street NW Suite 630
11	Washington DC 20004 Telephone: +1 (202) 386-9610
12	Email: pwarren@motleyrice.com
13	Co-Lead Counsel for Plaintiffs
14	JOSEPH G. VANZANDT
15	BEASLEY ALLEN CROW METHVIN PORTIS & MILES, P.C.
16	234 COMMERCE STREET MONTGOMERY, AL 36103
17	Telephone: + 1 (334) 269-2343 Email: joseph.vanzandt@beasleyallen.com
18	EMILY C. JEFFCOTT
19	MORGAN & MORGAN 220 W. GARDEN STREET, 9TH FLOOR
20	PENSACOLA, FL 32502 Telephone: +1 (850) 316-9100
21	Email: ejeffcott@forthepeople.com
22	RON AUSTIN RON AUSTIN LAW
23	400 Manhattan Blvd. Harvey LA, 70058
24	Telephone: +1 (504) 227–8100 Email: raustin@ronaustinlaw.com
25	MATTHEW BERGMAN
26	GLENN DRAPER SOCIAL MEDIA VICTIMS LAW CENTER
27	821 SECOND AVENUE, SUITE 2100 SEATTLE, WA 98104
28	Telephone: + 1 (206) 741-4862

1	Email: matt@socialmediavictims.org Email: glenn@socialmediavictims.org
2	JAMES J. BILSBORROW
3	WEITZ & LUXENBERG, PC 700 BROADWAY
4 5	NEW YORK, NY 10003 Telephone: + 1 (212) 558-5500 Facsimile: + 1 (212) 344-5461
6	Email: jbilsborrow@weitzlux.com
7	PAIGE BOLDT WATTS GUERRA LLP
8	4 Dominion Drive, Bldg. 3, Suite 100 San Antonio, TX 78257
9	Telephone: + 1 (210) 448-0500 Email: PBoldt@WattsGuerra.com
10	THOMAS P. CARTMELL WAGSTAFF & CARTMELL LLP
11	4740 Grand Avenue, Suite 300 Kansas City, MO 64112
12	Telephone: +1 (816) 701 1100 Email: tcartmell@wcllp.com
13	JAYNE CONROY
14	SIMMONS HANLY CONROY, LLC
15	112 MADISON AVE, 7TH FLOOR NEW YORK, NY 10016
16	Telephone: + 1 (917) 882-5522 Email: jconroy@simmonsfirm.com
17	CARRIE GOLDBERG
18	C.A. GOLDBERG, PLLC 16 Court St.
19	Brooklyn, NY 11241 Telephone: + 1 (646) 666-8908
20	Email: carrie@cagoldberglaw.com KIRK GOZA
21	GOZA & HONNOLD, LLC 9500 Nall Avenue, Suite 400
22	Overland Park, KS 66207 Telephone: +1 (913) 451-3433
23	Email: kgoza@gohonlaw.com
24	SIN-TINY MARY LIU AYLSTOCK WITKIN KREIS & OVERHOLTZ, PLLC
25	17 EAST MAIN STREET, SUITE 200 PENSACOLA, FL 32502
26	Telephone: + 1 (510) 698-9566 Email: mliu@awkolaw.com
2728	ANDRE MURA GIBBS LAW GROUP, LLP

1 2	1111 BROADWAY, SUITE 2100 OAKLAND, CA 94607 Telephone: +1 (510) 350-9717
3	Email: amm@classlawgroup.com
4 5	EMMIE PAULOS LEVIN PAPANTONIO RAFFERTY 316 SOUTH BAYLEN STREET, SUITE 600 PENSACOLA, FL 32502
6	Telephone: + 1 (850) 435-7107 Email: epaulos@levinlaw.com
7	ROLAND TELLIS
8	DAVID FERNANDES BARON & BUDD, P.C. 15910 Ventura Boulevard, Suite 1600
9	Encino, CA 91436 Telephone: + 1 (818) 839-2333
10	Facsimile: + 1 (818) 986-9698 Email: rtellis@baronbudd.com
11	Email: dfernandes@baronbudd.com
12	ALEXANDRA WALSH WALSH LAW
13	1050 Connecticut Ave, NW, Suite 500 Washington D.C. 20036
14	Telephone: + 1 (202) 780-3014 Email: awalsh@alexwalshlaw.com
15	MICHAEL M. WEINKOWITZ
16	LEVIN SEDRAN & BERMAN, LLP 510 WALNUT STREET
17	SUITE 500 PHILADELPHIA, PA 19106
18	Telephone: + 1 (215) 592-1500 Email: mweinkowitz@lfsbalw.com
19	DIANDRA "FU" DEBROSSE ZIMMERMANN
20	DICELLO LEVITT 505 20th St North
21	Suite 1500 Birmingham, Alabama 35203
22	Telephone: + 1 (205) 855-5700 Email: fu@dicellolevitt.com
23	ROBERT H. KLONOFF
24	ROBERT II. RECNOFF ROBERT KLONOFF, LLC 2425 SW 76TH AVENUE
25	PORTLAND, OR 97225 Telephone: +1 (503) 702-0218
26	Email: klonoff@usa.net HILLARY NAPPI
27	HACH & ROSE LLP 112 Madison Avenue, 10th Floor Now York, Now York 10016
28	New York, New York 10016

1	Telephone: +1 (212) 213-8311 Email: hnappi@hrsclaw.com
2	ANTHONY K. BRUSTER
3	BRUSTER PLLC
4 5	680 N. Carroll Ave., Suite 110 Southlake, TX 76092 Telephone: + 1 (817) 601-9564 Email: akbruster@brusterpllc.com
_	FRANCOIS M. BLAUDEAU, MD JD FACHE
6	FCLM
7 8	SOUTHERN INSTITUTE FOR MEDICAL AND LEGAL AFFAIRS
9	2762 B M Montgomery Street, Suite 101 Homewood, Alabama 35209 Telephone: + 1 (205) 564-2741
10	Email: francois@southernmedlaw.com
11	JAMES MARSH MARSH LAW FIRM PLLC
12	31 HUDSON YARDS, 11TH FLOOR NEW YORK, NY 10001-2170
	Telephone: + 1 (212) 372-3030
13	Email: jamesmarsh@marshlaw.com
14	Attorneys for Plaintiffs
15	COVINGTON & BURLING LLP
15 16	COVINGTON & BURLING LLP /s/Phyllis A. Jones
	/s/Phyllis A. Jones Phyllis A. Jones, pro hac vice
16	/s/Phyllis A. Jones Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP
16 17	/s/Phyllis A. Jones Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW
16 17 18	/s/Phyllis A. Jones Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: +1 (202) 662-6000
16 17 18 19	/s/Phyllis A. Jones Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: +1 (202) 662-6000 Facsimile: +1 (202) 662-6291 Email: pajones@cov.com
16 17 18 19 20 21	/s/Phyllis A. Jones Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: +1 (202) 662-6000 Facsimile: +1 (202) 662-6291
16 17 18 19 20 21 22	Phyllis A. Jones Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: +1 (202) 662-6000 Facsimile: +1 (202) 662-6291 Email: pajones@cov.com Email: pschmidt@cov.com Emily Johnson Henn (State Bar. No. 269482)
16 17 18 19 20 21 22 23	/s/Phyllis A. Jones Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: + 1 (202) 662-6000 Facsimile: + 1 (202) 662-6291 Email: pajones@cov.com Email: pschmidt@cov.com Emily Johnson Henn (State Bar. No. 269482) COVINGTON & BURLING LLP 3000 El Camino Real
16 17 18 19 20 21 22 23 24	/s/Phyllis A. Jones Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: +1 (202) 662-6000 Facsimile: +1 (202) 662-6291 Email: pajones@cov.com Email: pschmidt@cov.com Emily Johnson Henn (State Bar. No. 269482) COVINGTON & BURLING LLP 3000 El Camino Real 5 Palo Alto Square, 10th Floor Palo Alto, CA 94306
16 17 18 19 20 21 22 23 24 25	Phyllis A. Jones Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: + 1 (202) 662-6000 Facsimile: + 1 (202) 662-6291 Email: pajones@cov.com Email: pschmidt@cov.com Emily Johnson Henn (State Bar. No. 269482) COVINGTON & BURLING LLP 3000 El Camino Real 5 Palo Alto Square, 10th Floor Palo Alto, CA 94306 Telephone: + 1 (650) 632-4700 Facsimile: +1 (650) 632-4800
16 17 18 19 20 21 22 23 24 25 26	Phyllis A. Jones Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: + 1 (202) 662-6000 Facsimile: + 1 (202) 662-6291 Email: pajones@cov.com Email: pschmidt@cov.com Emily Johnson Henn (State Bar. No. 269482) COVINGTON & BURLING LLP 3000 El Camino Real 5 Palo Alto Square, 10th Floor Palo Alto, CA 94306 Telephone: + 1 (650) 632-4700 Facsimile: +1 (650) 632-4800 Email: ehenn@cov.com
16 17 18 19 20 21 22 23 24 25	Phyllis A. Jones Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: + 1 (202) 662-6000 Facsimile: + 1 (202) 662-6291 Email: pajones@cov.com Email: pschmidt@cov.com Emily Johnson Henn (State Bar. No. 269482) COVINGTON & BURLING LLP 3000 El Camino Real 5 Palo Alto Square, 10th Floor Palo Alto, CA 94306 Telephone: + 1 (650) 632-4700 Facsimile: +1 (650) 632-4800

1	Los Angeles, CA 90067 Telephone: + 1 (424) 332-4800
2	Facsimile: +1 (424) 332-4749 Email: asimonsen@cov.com
3	Isaac D. Chaput (State Bar. No. 326923)
4 5	COVINGTON & BURLING LLP Salesforce Tower 415 Mission Street, Suite 5400
6	415 Mission Street, Suite 5400 San Francisco, CA 94105 Telephone: + 1 (415) 591-6000
7	Facsimile: +1 (415) 591-6091 Email: ichaput@cov.com
8	Gregory L. Halperin, pro hac vice
9	COVINGTON & BURLING LLP 620 Eighth Avenue New York, NY 10018
10	Telephone: +1 (212) 841-1000 Facsimile: +1 (212) 841-1010
11	Email: ghalperin@cov.com
12	Attorney for Defendants Meta Platforms, Inc. f/k/a Facebook, Inc.; Facebook Holdings, LLC;
13	Facebook Operations, LLC; Facebook Payments, Inc.; Facebook Technologies, LLC;
14 15	Instagram, LLC; Siculus, Inc.; and Mark Elliot Zuckerberg
16	KING & SPALDING LLP
17	/s/ Geofrey M. Drake
18	Geoffrey M. Drake King & Spalding LLP
19	1180 Peachtree Street, NE, Suite 1600 Atlanta, GA 30309
20	Telephone: + 1 (404) 572-4600 Facsimile: + 1 (404) 572-5100 Email: gdrake@kslaw.com
21	Eman. garake@ksiaw.com
22	FAEGRE DRINKER LLP
23	/s/ Andrea Roberts Pieron Andrea Roberts Pierson
24	Faegre Drinker LLP 300 N. Meridian Street, Suite 2500
2526	Indianapolis, IN 46204 Telephone: + 1 (317) 237-0300 Facsimile: + 1 (317) 237-1000
27	Email: andrea.pierson@faegredrinker.com
28	Attorneys for Defendants TikTok Inc. and ByteDance Inc.
	STIPULATION AND [PROPOSED] ORDER REGARDING

1	
2	WILSON SONSINI GOODRICH & ROSATI Professional Corporation
3	/s/ Lauren Gallo White
4	Lauren Gallo White Wilson Sonsini Goodrich & Rosati
5	lwhite@wsgr.com Samantha A. Machock
6	smachock@wsgr.com
7	One Market Plaza, Spear Tower, Suite 3300 San Francisco, CA 94105
8	Telephone: (415) 947-2000 Facsimile: (415) 947-2099
9	Brian M. Willen Wilson Sonsini Goodrich & Rosati
10	bwillen@wsgr.com 1301 Avenue of the Americas, 40th Floor
11	New York, New York 10019
12	Telephone: (212) 999-5800 Facsimile: (212) 999-5899
13	Christopher Chiou Wilson Sonsini Goodrich & Rosati
14	cchiou@wsgr.com 633 West Fifth Street
15	Los Angeles, CA 90071-2048 Telephone: (323) 210-2900
16	Facsimile: (866) 974-7329
17	WILLIAMS & CONNOLLY LLP
18	/s/ Joseph G. Petrosinelli
19	Joseph G. Petrosinelli, pro hac vice jpetrosinelli@wc.com
20	Ashley W. Hardin, <i>pro hac vice</i> ahardin@wc.com
21	680 Maine Avenue, SW Washington, DC 20024
22	Tel.: 202-434-5000
23	Attorneys for Defendants YouTube, LLC, Google LLC, and Alphabet Inc.
24	Google BBC, and Impraced Inc.
25	MUNGER, TOLLES & OLSON LLP
26	/s/ Jonathan H. Blavin Jonathan H. Blavin, SBN 230269
27	MUNGER, TOLLES & OLSON LLP 560 Mission Street, 27th Floor
28	San Francisco, CA 94105-3089

Case 4:22-md-03047-YGR Document 394 Filed 10/23/23 Page 9 of 9 1 Telephone: (415) 512-4000 Facsimile: (415) 512-4077 2 Rose L. Ehler (SBN 29652) 3 Victoria A. Degtyareva (SBN 284199) Ariel T. Teshuva (SBN 324238) MUNGER, TOLLES & OLSON LLP 4 350 South Grand Avenue, 50th Floor Los Angeles, CA 90071-3426 5 Telephone: (213) 683-9100 Facsimile: (213) 687-3702 6 7 Lauren A. Bell, pro hac vice MUNGER, TOLLES & OLSON LLP 8 601 Massachusetts Ave., NW St., Suite 500 E 9 Washington, D.C. 20001-5369 Telephone: (202) 220-1100 10 Facsimile: (202) 220-2300 11 Attorneys for Defendant Snap Inc. 12 IT IS SO ORDERED. 13 14 DATE: <u>October 23, 2023</u> 15 16 17 18 SIGNATURE CERTIFICATION 19 Pursuant to Civ. L.R. 5-1(h)(3), I hereby attest that all signatories listed, and on whose 20 behalf the filing is submitted, concur in this filing's content and have authorized this filing. 21 Dated: October 19, 2023 22 /s/ Jennie Lee Anderson ANDRUS ANDERSON LLP 23 155 Montgomery Street, Suite 900 San Francisco, CA 94104 24 Tel. (415) 986-1400 25 Fax. (415) 986-1474 jennie@andrusanderson.com 26

Liaison Counsel for Plaintiffs

27